

1 Michael Avanesian, Esq. (SBN 278685)
2 **JT LEGAL GROUP, APC**
3 801 N. Brand Blvd., Suite 1130
4 Glendale, California 91203
5 Tel: 818.745.1594 | Fax: 747.444.2369
6 michael@jtlegalgroup.com

7
6 Attorneys for Debtor,
5 James Michael Bradley, Jr.

8
9 **UNITED STATES BANKRUPTCY COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**
11 **SACRAMENTO DIVISION**

12 In re: Case No.: 18-25406
13 JAMES MICHAEL BRADLEY, JR. Chapter 13
14
15 Debtor. *Assigned to Hon. Michael S. McManus,
16 United States Bankruptcy Judge*

17
18 **DECLARATION OF MICHAEL
19 AVANESIAN, ESQ. IN SUPPORT
20 OF MOTION TO VOLUNTARY
21 CONVERT CASE FROM
22 CHAPTER 7 TO CHAPTER 13**

23 Date: October 15, 2018
24 Time: 10:00 a.m.
25 Ctrm: 28

26
27 **DECLARATION OF MICHAEL AVANESIAN, ESQ.**

28 I, Michael Avanesian, declare:

- 29 1. I am an attorney at law duly licensed to practice before the Courts of this
30 State and the United States Bankruptcy Court for the Eastern District of
31 California.
- 32 2. I am the managing partner of JT Legal Group APC, attorney of record for
33 the Debtor James Michael Bradley, Jr. ("Debtor").

- 1 3. I make this Declaration in support of the Debtor's Motion to Voluntarily
- 2 Convert Chapter 7 Case to Chapter 13.
- 3 4. Each of the facts stated in this Declaration are personally known to me and if
- 4 required to do so I could and would competently testify thereto.
- 5 5. The Debtor intended to file a Chapter 13 case with this Court on August 28,
- 6 2018; however, through inadvertence and mistake the incorrect box was
- 7 checked on Petition form that was electronically filed with this Court
- 8 resulting in the commencement of a Chapter 7 case instead of a Chapter 13
- 9 case. I apologize to the Court for this inadvertent error. It is the Debtor's
- 10 desire that this case be immediately converted to a Chapter 13 case so that
- 11 he can propose a Chapter 13 Plan of Reorganization that will enable him to
- 12 cure the arrearages on his home loan.
- 13 6. There are no other motions pending with this Court seeking to convert this
- 14 case or to dismiss this case with prejudice.
- 15 7. In view of the foregoing I respectfully request the Court to grant this Ex
- 16 Parte Motion and to enter its Order Converting this case to a Chapter 13
- 17 case.

18 I declare under penalty of perjury under the laws of the United States of
19 America that the foregoing is true and correct and that this Declaration was
20 executed this 4th day of September, 2018 at Glendale, California.

Michael A.

MICHAEL AVANESIAN

PROOF OF SERVICE

I am over 18 years of age and am not a party to this action. I am employed in the City of Glendale, County of Los Angeles, State of California. My business address is 801 N. Brand Blvd., Ste. 1130, Glendale, California 91203.

I served a true copy of the attached document(s) on the person(s) listed below and on the attached mailing list by placing a true copy, enclosed in a sealed envelope for collection and mailing, on the date shown below, and at the business address shown above, following our ordinary business practices. I am familiar with this business practice for collection and processing of correspondence for mailing with the United States Postal Service. On the same day that a sealed envelope is placed for collection and mailing, it is deposited in the ordinary course of business, with the United States Postal Service with postage fully paid.

DATE OF DEPOSIT: September 4, 2018

EXACT TITLE OF DOCUMENTS SERVED: Declaration of Michael Avanesian In Support of Motion to Voluntarily Convert Case From Chapter 7 to Chapter 13

ADDRESSED AS FOLLOWS:

Eric J. Nims Trustee (Electronically Served)	U.S. Trustee (Electronically Served)
---	---

**MAILING LIST
ATTACHED**

I declare under penalty of perjury under the laws of the United States of America, That the foregoing is true and correct, this 4th day of September, 2018 in the City of Glendale, in the State of California.

/s/ Thomas Kent

Thomas Kent

MAILING LIST

In re James Michael Bradley, Jr.

USBC Case No. 18-25406

Capital One Auto Finance
AIS Portfolio Services, LP
Acct: XXXXXxx7673
4515 N. Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

Cenlar Federal Savings Bank
P.O. Box 77409
Trenton, N.J. 08618

Prestige Default Services
1920 Old Tustin Avenue
Santa Ana, California 92705